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*Attorneys for Defendants
Afognak Native Corporation and Alutiiq, LLC*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA *ex. rel.* BEN
FERRIS,

Plaintiff,

v.

AFOGNAK NATIVE CORPORATION and
ALUTIIQ, LLC,

Defendants.

Case No. 3:15-cv-00150-HRH

**JOINT STIPULATION FOR
DISMISSAL WITH PREJUDICE**

Relator Ben Ferris, Defendants Afognak Native Corporation and Alutiiq, LLC, and Interested Party the United States of America (collectively, "the Parties"), through counsel, jointly file this stipulation pursuant to Fed. R. Civ. P. 41(a)(1) and 31 U.S.C. § 3730(b)(1)

requesting that this action be dismissed in its entirety, on the merits, and with prejudice, as fully and finally settled.

Following mediation and further negotiations, this matter has settled. Pursuant to the settlement agreements executed by the Parties, Relator will receive a portion of the settlement proceeds in accordance with 31 U.S.C. § 3730(d)(2). The remainder of the settlement proceeds will be allocated to the United States. Pursuant to the settlement agreements, Relator will also receive an agreed amount for reasonable expenses and attorneys' fees incurred, in accordance with 31 U.S.C. § 3730(d)(2). Except as expressly provided in any settlement agreement, each Party will bear his or its own attorneys' fees, costs, and expenses incurred in either prosecuting or defending this matter. By signing below, the Parties stipulate and agree that the settlement and all of terms thereof are reasonable and appropriate under the circumstances and resolve all claims between or among the Parties.

Accordingly, the Parties respectfully request that this matter be dismissed in its entirety, on the merits, and with prejudice, as fully and finally settled. A proposed order is filed herewith.

Dated: March 15, 2019.

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CERTIFICATE OF SERVICE

I certify that on March 15, 2019, the foregoing was filed with the Court's electronic filing system which served a copy on all counsel of record.

By: s/Angela R. Jones
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